

Laurent, David

From: Disher, Todd
Sent: Monday, September 16, 2019 10:24 AM
To: Nina Perales
Cc: Glenn Moramarco; Jeremy Hollander; Biggs, Adam
Subject: DACA - Ms. Franklin's deposition
Attachments: AR Docs.pdf

Nina,

Please see the attached document production from Arkansas. These documents represent the non-privileged documents in the witness's possession, custody, or control that are responsive to your document requests attached to the deposition notice other than the communications between state agency personnel and counsel or persons acting at the direction of counsel. Arkansas may supplement these documents if it identifies additional responsive documents.

Please note that the Medicaid spreadsheet contains information going back to January 1, 2018, the time period included in Ms. Franklin's declaration. The personally identifying information has been redacted. Arkansas objects to having to provide any additional information for other years. Such information is not proportional to the needs of the case and outside the scope of discovery.

Additionally, here is a link to the Arkansas Medicaid manual:

https://urldefense.proofpoint.com/v2/url?u=https-3A_humanservices.arkansas.gov_about-2Ddhs_dco_dco-2Dpolicies&d=DwlGaQ&c=Z_mC1sqOcfBCM1ZptXokOj7_ss37GsaAMzCZyvOxKN4&r=sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=HMYQyWPaoHrRYyHsUnSIWYT3yVibi91Hdmq88USnsNI&s=8x56Sj5prwKMIsMDjLiWH4sA2cpZE6EDxICMBWWDiEw&e=

Arkansas will provide redacted communications and a privilege log at the time of the depositions.

Todd

/s/ Todd Lawrence Disher

Todd Lawrence Disher
Trial Counsel for Civil Litigation
Office of the Attorney General of Texas
P.O. Box 12548 (MC 001)
Austin, TX 78711-2548
(512) 936-2266
Todd.Disher@oag.texas.gov